

**Kaufman  
Lieb  
Lebowitz &  
Frick**

attorneys at law

(212) 660-2332  
18 E. 48th St., Suite 802  
New York, NY 10017  
www.kllf-law.com

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**Via ECF**

Hon. Gabriel Gorenstein  
United States Magistrate Judge  
Southern District of New York

Re: In re: New York City Policing During Summer 2020 Demonstrations,  
No. 20-CV-8924  
This filing is related to all cases

Your Honor:

On behalf of Plaintiffs, we write to oppose the Union-Intervenors' proposed order (Dkt. #666), requiring Plaintiffs to share any pre-deposition materials they send to Defendants with Union-Intervenors as well. The goal of providing Defendants with certain topics and exhibits in advance of a deposition—to assist with preparing the witness thereby ensuring an efficient deposition—is not served by providing that information to the Union-Intervenors, who (to our knowledge) are not representing any deponents for purposes of their depositions. The Union-Intervenors have no reason to receive information from Plaintiffs in advance of depositions Plaintiffs have noticed.

We ask the Court to so-order the proposed order submitted by Plaintiffs and Defendants at Dkt. #665.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_

Alison Frick

Alanna Kaufman\* • Douglas E. Lieb<sup>†</sup> • David A. Lebowitz • Alison Frick\*

• Alyssa Isidoridy •

\*Also admitted to practice in New Jersey <sup>†</sup>Also admitted to practice in California and Connecticut